

Draft Access to Care Proposal

Background: Senate Bill (S.B.) 760 and new rules issued by the Centers for Medicare & Medicaid Services (CMS) require HHSC to establish minimum access standards, including time and distance standards, for MCO provider networks for specific provider types. S.B. 760 and CMS rules authorize HHSC to establish standards that take Texas' geographic diversity and Medicaid population into account when developing standards. HHSC is also required to monitor MCOs compliance with established standards and to publish standards on the agency's website.

As part of its analysis, HHSC compared its existing provider access standards with other state Medicaid programs as well as Medicare standards established by CMS; conducted literature reviews; reviewed information provided by its external quality review organization (EQRO); and reviewed stakeholder feedback and complaints. The recommendations below are initial proposals. Additional analysis will be conducted to create access standards for other provider types required by S.B. 760 and CMS rules, including preventative care, chronic care, after-hours urgent care, nursing services, and prenatal care.

Recommendation 1: Revise existing provider access standards based on Medicare standards, but tailor Texas' standards based on its geography. Time and distance standards would be created for each service delivery area so MCOs would only be held accountable to the population it serves for a particular area of the state. Statewide appointment availability standards would also be created for certain provider types. All standards would only apply to appropriate MCO populations (for example, men would be omitted from OB/GYN standards). For new standards or standards that are changing, MCO provider networks would need to achieve 75 percent compliance by September 1, 2017; 85 percent compliance by September 1, 2018; and 90 percent compliance by September 1, 2019. See the table below for a list of proposed standards.

Provider Type	Proposed Measures and Standards (change from existing standard)
Primary Care Provider (including adult and pediatric)***	<u>Travel Time</u> <ul style="list-style-type: none">Bexar, Dallas, Harris, Tarrant, Travis: 15 minutes (new standard)El Paso, Hidalgo, Jefferson, Lubbock, Nueces: 30 minutes (new standard)MRSA Central, Northeast, and West: 40 minutes (new standard) <u>Travel Distance</u> <ul style="list-style-type: none">Bexar, Dallas, Harris, Tarrant, Travis: 10 miles (20 miles less to drive)El Paso, Hidalgo, Jefferson, Lubbock, Nueces: 20 miles (10 miles less to drive)MRSA Central, Northeast, and West: 30 miles (same standard) <u>Appointment Availability</u> <ul style="list-style-type: none">Statewide: Within 14 days (same standard)
OB/GYN*	<u>Travel Time</u> <ul style="list-style-type: none">Bexar, Dallas, Harris, Tarrant, Travis: 45 minutes (new standard)El Paso, Hidalgo, Jefferson, Lubbock, Nueces: 80 minutes (new standard)MRSA Central, Northeast, and West: 90 minutes (new standard) <u>Travel Distance</u> <ul style="list-style-type: none">Bexar, Dallas, Harris, Tarrant, Travis: 30 miles (45 miles less to drive)El Paso, Hidalgo, Jefferson, Lubbock, Nueces: 60 miles (15 miles less to drive)MRSA Central, Northeast, and West: 75 miles (same standard) <u>Appointment Availability</u> <ul style="list-style-type: none">Statewide: Within 14 days (new standard)

Provider Type	Proposed Measures and Standards (change from existing standard)
Specialty Care (including adult and pediatric)***	<p><u>Travel Time</u></p> <ul style="list-style-type: none"> Bexar, Dallas, Harris, Tarrant, Travis: 45 minutes (new standard) El Paso, Hidalgo, Jefferson, Lubbock, Nueces: 80 minutes (new standard) MRSA Central, Northeast, and West: 90 minutes (new standard) <p><u>Travel Distance</u></p> <ul style="list-style-type: none"> Bexar, Dallas, Harris, Tarrant, Travis: 30 miles (45 miles less to drive) El Paso, Hidalgo, Jefferson, Lubbock, Nueces: 60 miles (15 miles less to drive) MRSA Central, Northeast, and West: 75 miles (same standard) <p><u>Appointment Availability</u></p> <ul style="list-style-type: none"> Statewide: Within 30 days upon receiving a referral (new standard)
Behavioral Health (including adult and pediatric)*	<p><u>Travel Time</u></p> <ul style="list-style-type: none"> Bexar, Dallas, Harris, Tarrant, Travis: 45 minutes (new standard) El Paso, Hidalgo, Jefferson, Lubbock, Nueces: 100 minutes (new standard) MRSA Central, Northeast, and West: 90 minutes (new standard) <p><u>Travel Distance</u></p> <ul style="list-style-type: none"> Bexar, Dallas, Harris, Tarrant, Travis: 30 miles (same standard) El Paso, Hidalgo, Jefferson, Lubbock, Nueces: 75 miles (same standard) MRSA Central, Northeast, and West: 75 miles (same standard) <p><u>Appointment Availability</u></p> <ul style="list-style-type: none"> Statewide: Within 14 days (same standard)
Dentists*	<p><u>Travel Time</u></p> <ul style="list-style-type: none"> Bexar, Dallas, Harris, Tarrant, Travis: 45 minutes (new standard) El Paso, Hidalgo, Jefferson, Lubbock, Nueces: 80 minutes (new standard) MRSA Central, Northeast, and West: 90 minutes (new standard) <p><u>Travel Distance</u></p> <ul style="list-style-type: none"> Bexar, Dallas, Harris, Tarrant, Travis: 30 miles (same standard) El Paso, Hidalgo, Jefferson, Lubbock, Nueces: 60 miles (15 miles less to drive) MRSA Central, Northeast, and West: 75 miles (same standard) <p><u>Appointment Availability</u></p> <ul style="list-style-type: none"> Statewide: Within 14 days (new standard)
Hospital*	<p><u>Travel Time</u></p> <ul style="list-style-type: none"> Bexar, Dallas, Harris, Tarrant, Travis: 45 minutes (new standard) El Paso, Hidalgo, Jefferson, Lubbock, Nueces: 45 minutes (new standard) MRSA Central, Northeast West: 45 minutes (new standard) <p><u>Travel Distance</u></p> <ul style="list-style-type: none"> Bexar, Dallas, Harris, Tarrant, Travis: 30 miles (same standard) El Paso, Hidalgo, Jefferson, Lubbock, Nueces: 30 miles (same standard) MRSA Central, Northeast, and West: 30 miles (same standard) <p><u>Appointment Availability</u></p> <ul style="list-style-type: none"> Statewide: Within 24 hours (same standard)
Therapy Services**	<p><u>Travel Time</u></p> <ul style="list-style-type: none"> Bexar, Dallas, Harris, Tarrant, Travis: 45 minutes (new standard) El Paso, Hidalgo, Jefferson, Lubbock, Nueces: 80 minutes (new standard) MRSA Central, Northeast, and West: 75 minutes (new standard) <p><u>Travel Distance</u></p>

Provider Type	Proposed Measures and Standards (change from existing standard)
	<ul style="list-style-type: none"> Bexar, Dallas, Harris, Tarrant, Travis: 30 miles (new standard) El Paso, Hidalgo, Jefferson, Lubbock, Nueces: 60 miles (new standard) MRSA Central, Northeast, and West: 60 miles (new standard) <p><u>Appointment Availability</u></p> <ul style="list-style-type: none"> Statewide: Within 30 days upon receiving a referral (new standard)
Pharmacy*	<p><u>Travel Time</u></p> <ul style="list-style-type: none"> Bexar, Dallas, Harris, Tarrant, Travis: 10 minutes (pharmacy), 45 minutes (24-hour pharmacy) (new standard) El Paso, Hidalgo, Jefferson, Lubbock, Nueces: 20 minutes (pharmacy), 100 minutes (24-hour pharmacy) (new standard) MRSA Central, Northeast, and West: 30 minutes (pharmacy), 100 minutes (24-hour pharmacy) (new standard) <p><u>Travel Distance</u></p> <ul style="list-style-type: none"> Bexar, Dallas, Harris, Tarrant, Travis: 5 miles (pharmacy), 25 miles (24-hour pharmacy) (same standard 50 miles less to drive) El Paso, Hidalgo, Jefferson, Lubbock, Nueces: 10 miles (pharmacy), 75 miles (24-hour pharmacy) (5 miles less to drive same standard) MRSA Central, Northeast, and West: 15 miles (pharmacy), 75 miles (24-hour pharmacy) (same standard same standard)

*Required by CMS rules.

**Required by S.B. 760.

***Required by both CMS rules and S.B. 760.

Recommendation 2: Develop provider access standards for long-term services and supports. New standards could include:

- County of licensure versus participant's residence;
- Authorization time versus start time of services;
- Provider capacity;
- Appointment availability; and
- Turnover of provider's staff.

Recommendation 3: Develop access standards for other provider types specified in S.B. 760 and CMS rule, including, preventative care, chronic care, after-hours urgent care, nursing services, and prenatal care.

Recommendation 4: Research and develop innovative access standards and methods for increasing access to services, including tele-medicine.

Recommendation 5: Increase direct monitoring of MCO provider networks, including surveying providers and members and conducting secret shopper calls.

Recommendation 6: Publish MCO provider network data on the HHSC website on a quarterly basis.

Stakeholder Feedback: The following is a summary of comments that HHSC has received from stakeholders at the Managed Care and Network Adequacy forums last fall.

- Develop standards that reflect the healthcare needs of the Medicaid population and that takes the geographical differences of the state into account.
- Modify and apply Medicare standards to the Texas Medicaid program.

- Improve oversight of MCOs compliance with established standards.

Existing State or Federal Requirements: The following is a list of federal, state, and MCO contractual requirements that currently exist for provider access standards.

- 42 C.F.R. section 438.68 – Network Adequacy Standards
- Sections 533.0061 and 533.0062, Texas Government Code
- 28 T.A.C. Section 11.1607
- Uniform Managed Care Contract
 - Section 4.3.4 – Access to Care
- Uniform Managed Care Manual
 - Section 5.4.1 – Provider Network Reports

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